

EXHIBIT C

From: Sheng, Philip T.
Sent: Friday, November 5, 2021 3:06 PM
To: Landry, Brian R.
Cc: Lisson, David; Michalek, Brian R.; Kuo, Joseph M.; Lee, Lillian J.; Dillner, Julie K.; Farber, Alena
Subject: RE: Firtiva Subpoena to FreeWheel

Hi Brian,

As you requested, we reviewed the Protective Order and list FreeWheel's concerns below. Providing these concerns should not be interpreted as an acknowledgment or agreement that responsive documents exist or that FreeWheel will be producing documents in response to the subpoena. We are still reviewing the subpoena and will serve our responses and objections by November 15, 2021, as agreed.

1. The Protective Order permits in-house attorneys to view material designated "Restricted Confidential -- Attorneys' Eyes Only."
2. Paragraph 21 does not specify that Third Parties may designate material as "Restricted Confidential – Source Code."
3. The prosecution bar in Paragraph 11 is insufficient in a number of respects. First, it extends the prosecution bar only to Plaintiff Firtiva and not Defendant Funimation. Second, it only applies "to the field of the invention of the patents-in-suit or accused functionality," and not the field of FreeWheel's products, services, or technology. Third, "prosecution" does not expressly include all forms of practice and proceedings at the United States Patent and Trademark Office, including, for example, re-examination or *inter partes* review proceedings. Finally, the time period of only one year is too short.
4. Paragraph 10(h) omits the E.D. Texas Model Order's requirement that the receiving party maintain a log of any source code hard copies.
5. FreeWheel has not seen any of the experts, consultants, attorneys and other individuals who have signed on to the current PO.

Best,
Phil

From: Sheng, Philip T.
Sent: Friday, October 29, 2021 1:38 PM
To: 'Landry, Brian R.' <Brian.Landry@saul.com>
Cc: Lisson, David <david.lisson@davispolk.com>; 'Michalek, Brian R.' <brian.michalek@saul.com>; 'Kuo, Joseph M.' <joseph.kuo@saul.com>; 'Lee, Lillian J.' <lillian.lee@saul.com>; 'Dillner, Julie K.' <julie.dillner@saul.com>; Farber, Alena <alena.farber@davispolk.com>
Subject: RE: Firtiva Subpoena to FreeWheel

Hi Brian,

It was a pleasure speaking with you today. I am writing to memorialize that Firtiva consents to an extension of time for FreeWheel to serve its responses and objections to November 15, 2021. Also, we will review the Protective Order and raise any concerns by next week. If this is not accurate, please let me know. Otherwise, have a great weekend.

Best,
Phil

From: Sheng, Philip T.
Sent: Friday, October 29, 2021 10:31 AM
To: 'Landry, Brian R.' <Brian.Landry@saul.com>
Cc: Lisson, David <david.lisson@davispolk.com>; Michalek, Brian R. <brian.michalek@saul.com>; Kuo, Joseph M. <joseph.kuo@saul.com>; Lee, Lillian J. <lillian.lee@saul.com>; Dillner, Julie K. <julie.dillner@saul.com>
Subject: RE: Firtiva Subpoena to FreeWheel

Hi Brian,
No problem. I just updated the invite.

Best,
Phil

From: Landry, Brian R. <Brian.Landry@saul.com>
Sent: Friday, October 29, 2021 10:29 AM
To: Sheng, Philip T. <philip.sheng@davispolk.com>
Cc: Lisson, David <david.lisson@davispolk.com>; Michalek, Brian R. <brian.michalek@saul.com>; Kuo, Joseph M. <joseph.kuo@saul.com>; Lee, Lillian J. <lillian.lee@saul.com>; Dillner, Julie K. <julie.dillner@saul.com>
Subject: RE: Firtiva Subpoena to FreeWheel

Hi, Phil.

With apologies for any inconvenience, I forgot to check my iPhone calendar and am double-booked at 2:00 with a meeting with my daughter's teacher.

Would 4:00 Eastern today work for your team?

Thanks and best regards,

Brian

Brian Landry | SAUL EWING | 617-912-0969

From: Sheng, Philip T. <philip.sheng@davispolk.com>
Sent: Friday, October 29, 2021 11:57 AM
To: Landry, Brian R. <Brian.Landry@saul.com>
Cc: Lisson, David <david.lisson@davispolk.com>; Michalek, Brian R. <brian.michalek@saul.com>; Joseph, Cynthia J. <Cynthia.Joseph@saul.com>; Lee, Lillian J. <lillian.lee@saul.com>; Dillner, Julie K. <julie.dillner@saul.com>
Subject: RE: Firtiva Subpoena to FreeWheel

Hi Brian,

I just sent your team an invite for 2pm ET. Talk to you in a bit.

Best,
Phil

From: Landry, Brian R. <Brian.Landry@saul.com>
Sent: Friday, October 29, 2021 7:31 AM
To: Sheng, Philip T. <philip.sheng@davispolk.com>
Cc: Lisson, David <david.lisson@davispolk.com>; Michalek, Brian R. <brian.michalek@saul.com>; Joseph, Cynthia J. <Cynthia.Joseph@saul.com>; Lee, Lillian J. <lillian.lee@saul.com>; Dillner, Julie K. <julie.dillner@saul.com>
Subject: RE: Firtiva Subpoena to FreeWheel

Hi, Phil.

Further to our correspondence yesterday, are you available for a call today to discuss?

We are currently free after noon Eastern. If you have availability, would you please send an calendar invite for your preferred time?

Best regards,

Brian

Brian Landry | SAUL EWING | 617-912-0969

From: Landry, Brian R.
Sent: Thursday, October 28, 2021 7:07 PM
To: 'Sheng, Philip T.' <philip.sheng@davispolk.com>
Cc: Lisson, David <david.lisson@davispolk.com>; Brian R. Michalek (<brian.michalek@saul.com>) <brian.michalek@saul.com>; Lillian J. Lee (<lillian.lee@saul.com>) <lillian.lee@saul.com>; Dillner, Julie K. <julie.dillner@saul.com>
Subject: RE: Firtiva Subpoena to FreeWheel

Hi, Philip.

We confirm safe receipt of your e-mail and anticipate providing a substantive response by mid-day tomorrow.

Best regards,

Brian Landry

SAUL EWING
ARNSTEIN
& LEHR LLP

Brian R. Landry
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Tel: 617.912.0969 | Fax: 857.400.3780
Brian.Landry@saul.com | www.saul.com

From: Sheng, Philip T. <philip.sheng@davispolk.com>
Sent: Thursday, October 28, 2021 1:11 PM
To: Landry, Brian R. <Brian.Landry@saul.com>

Cc: Lisson, David <david.lisson@davispolk.com>

Subject: Firtiva Subpoena to FreeWheel

****EXTERNAL EMAIL** - This message originates from outside our Firm. Please consider carefully before responding or clicking links/attachments.**

Hi Brian,

We represent FreeWheel Media, Inc. in connection with the attached third-party subpoena served by Firtiva Corporation. We only recently received the subpoena and thus request a reasonable extension of time to serve FreeWheel's objections and responses to November 15, 2021. Please let us know if Firtiva is amenable to this request.

Best,
Phil

"Saul Ewing Arnstein & Lehr LLP (saul.com)" has made the following annotations:

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